

The proposals included in this NPRM are critical to the continuing evolution and success of wireless broadband provisioning, particularly in rural areas.

Currently, the ability of service providers to accommodate the public's demand for reliable broadband service is often hampered by interference from other unlicensed devices, or by the combined limitations of power and propagation. In many areas - including rural areas, such as Jefferson County, WI - interference from other unlicensed devices make the 2.4 GHz. band virtually unusable. In some areas, 5.8 GHz. can be used as an alternative, but it often presents other impediments to creating and maintaining reliable outdoor links.

The addition of spectrum at 3.650 GHz. provides Wireless Internet Service Providers with greater flexibility in determining the best solution for the provisioning of reliable service to their customers. In addition, the increase in allowable power, proposed in the NPRM, will permit the service provider to serve a greater area, without needing to acquire additional antenna sites, thus making service more widely available. This is especially important in rural areas, where customer density is typically low.

I believe the Commission has provided adequate safeguards for the fixed satellite service, both in the protections described in the Notice, and by requiring Wireless Internet Service Provider installations to be completed by recognized professionals.

In the current WISP industry, manufacturers have much of the responsibility for the compliance of their equipment's installation. Most conduct training, resulting in certification. This model has been relatively effective to this point.

Perhaps the higher power levels, included in these proposals, do warrant a higher level of expertise, at a minimum, for those conducting the training. These might include professional certification, such as the National Association of Radio and Telecommunications Engineers (NARTE) or those holding legacy FCC General Radio Operator's Licenses (GROL).

In summary, the Wireless Internet Service Provider industry would be well served, by the flexibility afforded by these proposals.